

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**ARLENE CANNON and on behalf
of her minor daughter
KARA CANNON,**

Plaintiff,

V.

**NATIONAL RAILROAD PASSENGER
CORPORATION (Amtrak),**

Defendant.

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**JOINT MOTION TO ADJOURN PRETRIAL DEADLINES
UNTIL AUGUST 14, 2003
TO ALLOW PARTIES TO ENGAGE IN MEDIATION**

Plaintiff Arlene Cannon and Defendant National Railroad Passenger Corporation (“Amtrak”), through undersigned counsel, respectfully move this Court to adjourn the pending Pretrial Deadlines for a brief period of forty-five (45) days, until August 14, 2003, so that the parties may participate in mediation that will hopefully resolve this dispute short of trial.

The grounds for this motion are as follows:

1. On May 21, 2003, the discovery deadline was extended until June 30, 2003 in order to complete the deposition of plaintiff, Arlene Cannon.
2. On June 25, 2003 and June 27, 2003, defendant Amtrak completed the deposition of plaintiff, Arlene Cannon. Thereafter, the parties consented to engage in mediation.
3. Good cause therefore exists for an extension of the pending pretrial schedule.

Accordingly, the parties respectfully request that the Court grant this motion and order that the current Pretrial deadlines be adjourned briefly until August 14, 2003 to allow the parties to participate in mediation.

4. A proposed Order accompanies this motion.

Respectfully submitted,

LANDMAN CORSI BALLAINE & FORD P.C.
Attorneys for Defendant
National Railroad Passenger Corporation
("Amtrak")

By: _____

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Dated: July 2, 2003

CERTIFICATE OF SERVICE

I hereby certify that a copy of the Joint Motion to Adjourn Pretrial Deadlines was served via fax and first class mail this 2nd day of July, 2003 on the following:

Anthony Brady, Jr., Esq.
Parkade Building
519 Federal Building
Suite 202
Camden, NJ 08101

Barry Weintraub, Esq.
32 Hayes Street
Stafford, VA 22556

Raquel M. Fruchter

Dated: July 2, 2003